

AMENDMENTS TO THE DRAWINGS

Figure 1A has been amended to include a lead line from reference numeral “42”.

Figure 5 has been amended to include a second lead line from reference numeral “22”.

Fig. 10 has been amended to remove reference numeral “61A”, which was not discussed in the instant application.

Figs. 17A and 17B have been amended to remove reference numeral “17”, which was not discussed in the instant application.

REMARKS

Applicants request favorable reconsideration of this application in view of the foregoing amendments and the following remarks. Of claims 1-12 that were pending in the application, claims 5-12 remain withdrawn from consideration and claims 1-4 were rejected in the Office Action. By way of this amendment, Applicants have: (a) amended examined claims 1-4; (b) amended withdrawn claims 6-12; and (c) added new claims 13-15, each of which depends (directly or indirectly) from examined claim 2. Accordingly, claims 1-4 and 13-15 are respectfully presented for further consideration.

1 Rejections of Claims 1-4

The Examiner rejected: (a) claims 1-3 under 35 U.S.C. § 102(b) as allegedly being anticipated by U.S. Patent No. 5,596,881 (“Wilson”); and (b) claims 2 and 4 under 35 U.S.C. § 102(b) as allegedly being anticipated by U.S. Patent No. 5,743,571 (“Gaitros”). For the following reasons, Applicants respectfully traverse both of these rejections.

A. Claim 1

As amended herein, claim 1 recites a structure for connecting a first member and a second member. The structure includes, among other possible things (italic emphasis added):

a first member; and
style="padding-left: 40px;">a second member that includes *a blade portion*,
style="padding-left: 40px;">wherein the first member has a peripheral wall portion that includes a stepped portion engaged with the second member,
style="padding-left: 40px;">wherein the peripheral wall portion is a deformed portion that is deformed inwardly of the stepped portion of the first member,
style="padding-left: 40px;">wherein the deformed portion has a thin shape that is provided by a cut section of the peripheral wall portion,
style="padding-left: 40px;">wherein the deformed portion is formed by a cut performed by the blade portion, and
style="padding-left: 40px;">wherein the blade portion includes an inclined face portion that is recessed with a curvature.

For at least the following reasons, Wilson fails to teach or suggest such a structure.

In rejecting claim 1, the Examiner analogizes Wilson’s deformed surface material 74 to the “deformed portion” recited in claim 1. Even accepting this analogy, Wilson fails to teach or suggest that the deformed surface material 74 is “formed by a cut performed by [a] blade portion,” as above-italicized in claim 1. Moreover, further to this deficiency of Wilson, Wilson also fails to teach or suggest a “blade portion [that] includes an inclined face portion that is recessed with a curvature,” also as above-italicized in claim 1.

For at least the foregoing reasons, Wilson fails to teach or suggest each of the limitations of claim 1. As a result, Wilson can not be used to reject claim 1 under 35 U.S.C. § 102(b) and, therefore, a withdrawal of the rejection of claim 1 is both warranted and earnestly solicited.

B. Claims 2-4

As amended herein, claim 2 (*i.e.*, the claim from which claims 3 and 4 depend) recites a connecting structure of a pipe connected to a passage formed in a member. The structure includes, among other possible things (italic emphasis added):

a projection portion that is provided so as to project from the pipe radially and outwardly;

a recess portion that is provided at an open end of the passage formed in the member and that receives the projection portion of the pipe; and

a peripheral wall portion that is engaged with the projection portion by bending and deforming the peripheral wall portion inwardly of the recess portion while cutting the peripheral wall portion in a thin shape at a distance from the recess portion so that the pipe inserted into the opening end of the passage in the member and the projection portion of the pipe that has been received in the recess portion are connected,

wherein the peripheral wall portion is deformed by a cut performed by a blade portion, and

wherein the blade portion includes an inclined face portion that is recessed with a curvature.

For at least the following reasons, neither Wilson nor Gaitros teaches or suggests such a structure.

Wilson: As previously discussed with respect to claim 1, Wilson fails to teach or suggest a “blade portion [that] includes an inclined face portion that is recessed with a curvature.” As claim 2 also recites such a blade portion, claim 2 is also allowable over Wilson. In addition, however, in light of Wilson’s failure to teach a blade portion, Wilson also fails to teach or suggest that “the peripheral wall portion is deformed by a cut performed by a blade portion.” Accordingly, claim 2 is also allowable over Wilson for at least this additional reason.

Gaitros: Although Gaitros teaches a deformable trepan 8, Gaitros fails to teach or suggest that the trepan is “deformed by a cut performed by a blade portion.” Moreover, Gaitros, like Wilson, also fails to teach or suggest a “blade portion [that] includes an inclined face portion that is recessed with a curvature.” As a result, Gaitros also fails to teach or suggest each of the limitations of claim 2.

For at least the foregoing reasons, neither Wilson nor Gaitros teaches or suggests each of the limitations of claim 2. As a result, neither Wilson nor Gaitros can be used to reject claim 2, or any claim dependent thereon, under 35 U.S.C. § 102(b). Moreover, as claims 3 and 4 depend from claim 2, claims 3 and 4 are also allowable over Wilson and Gaitros, without regard to the other patentable limitations recited therein. Accordingly, a withdrawal of the rejections of claim 2-4 is both warranted and earnestly solicited.

2. New Claims 13-15

Support for new claims 13-15 is provided in Figs. 3 and 15, which detail the structure of two embodiments of an annular blade portion 41A. As new claims 13-15 have been added to depend from claim 2, new claims 13-15 are allowable for at least the same reasons as claim 2 and without regard to the other patentable limitations recited therein. An allowance of new claims 13-15 is, therefore, respectfully expected with the allowance of claim 2.

CONCLUSION

For the aforementioned reasons, claims 1-4 and 13-15 are now in condition for allowance. A Notice of Allowance at an early date is respectfully requested. The Examiner is invited to contact the undersigned if such communication would expedite the prosecution of the application.

Respectfully submitted,

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